

Fibre Box Association

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Docket Unit California Energy Commission Docket No. 01-GGE-1 1516 Ninth Street, MS 4 Sacramento, California 95814-5512

As a trade association representing forest product manufacturing interests in California, we appreciate the efforts of the California Climate Action Registry to address the importance of carbon sequestration in the climate change equation.

However, we are also concerned that the comment period for the draft forestry protocols is arbitrarily short and runs extreme risk of preventing the submission of all pertinent views and data on the matter. We are especially alarmed that as presently drafted the protocols exclude manufacturers of forest products from registering credits despite the fact that forest product manufacturers create the products that make sequestration possible.

Given the importance of this initiative, we respectfully request that the comment period be extended at least an additional 60 days to allow all interested parties and stakeholders to fairly and fully present their positions and supporting data.

Sincerely,

Brian O'Banion Vice President

Fibre Box Association